

Colorado Department of Health

Review and Comment

Draft Pilot Test Plan for Soil Vapor Extraction for the  
Subsurface IM/IRA for OU 2  
October 29, 1992

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1. Section 3.2.8: The Division needs additional clarification on the limit of 5 gpm identified in the text as the maximum groundwater pumping rate. The reason cited is very brief, but mentions transportation and treatment limitations. The Division does not believe that the existing OU 2 Surface Water Treatment Facility is close to operating at capacity bringing in to question a treatment limitation. In addition, the proximity of T-4 to the treatment facility minimizes transportation concerns.

2. Section 3.2.8: The "pooling" of DNAPLs at OU 2 sites is of particular concern to the Division. By indicating that the test area would be completely dewatered in the IM/IRA Decision Document, we felt that any DNAPL would be either pumped out with the water or exposed to the vapor extraction process. Now, however, with the admission that the test area probably will not be completely dewatered, pools of DNAPL may not become available to the extraction process. We appreciate the difficulties involved here, but feel that limiting the ground water pumping rate and thereby limiting the groundwater drawdown is not within the original "observational approach" universe of contingencies. This is a factor that is within DOE's control.

3. Section 5.3: Utilization of a truck to transport pumped groundwater to the treatment facility seems very inefficient given the proximity of the test area to the treatment facility.

4. Section 4.8.2: The sampling of all borings for all types of vents should follow already approved sampling methodologies in the Phase II RFI/RI Workplan(s). In addition, drill cuttings should be drummed pending characterization. Limiting laboratory analysis to only samples from the extraction vents potentially neglects valuable data.

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Review and Comment

Draft Soil Vapor Survey Workplan for the  
Subsurface IM/IRA in OU 2  
October 29, 1992

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1. There remains some confusion regarding IHSSs 110 and 111.1. The SVE Pilot Test Plan is built around the original assumption that IHSS 110 would be the best location. However, as the original IM/IRA was structured, DOE had the flexibility to change the plan if subsequent information indicated a better SVE location. If, as is indicated in Section 1.1 of the SVS Workplan, IHSS 111.1 now appears to be preferable, why does the final paragraph of Section 1.1 state that the SVS will first investigate IHSS 110 which, if it is adequate, will necessitate modification of the Pilot Test Plan? This seems backward to us. If IHSS 111.1 is preferable, then starting the SVS survey there seems more logical.

2. While we realize that the proposed SVS program is not designed as a characterization effort, the Division would like for DOE to make the surveys as consistent as possible with other soil gas surveys that will be implemented under other IAG activities. Therefore, we urge that:

- the soil vapor probe intake be placed at least 5 feet below the ground surface.
- the SVS subcontractor operate under all preexisting and applicable SOPs.

3. On Figures 3-3, 3-5, and 3-6, survey points are indicated for IHSSs 109, 110, and 111.1. Since these IHSSs are very narrow (approximately 3 feet), please explain why survey points along each side of the trenches will be necessary. The Division recommends that at least three 25 to 50 foot-spaced lines of survey points be run for each of these IHSSs with the middle line of survey points being directly adjacent to one of the IHSS edges.

4. A schedule needs to be developed for implementation of the SVS.